

EXHIBIT F

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REPORTING & VIDEO, INC.



IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
AUSTIN DIVISION

HITUL GANDHI, individually)
and on behalf of a class of)
others similarly situated,)

Plaintiff,)

vs.)

No. A-08-CA-248-JRN

DELL INC., and DELL)
MARKETING USA, L.P.,)

Defendant.)

CATHERINE L. DAVIS and TOMMY)
MOORE, Individually and on)
Behalf of others similarly)
situated,)

vs.)

No. A-08-CA-794-JRN

DELL, INC. d/b/a DELL)
COMPUTER, INC., a Delaware)
corporation, DELL USA L.P.,)
a Texas Limited Partnership)
and DELL MARKETING L.P., a)
Texas Limited Partnership,)

Defendant.)

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3 DEPOSITION OF IZETTA MARSHAE CARSON
4 TAKEN ON BEHALF OF THE DEFENDANTS
5 IN OKLAHOMA CITY, OKLAHOMA
6 ON DECEMBER 18, 2008
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13 Reported by: Elizabeth Caudill, CSR, RMR, CRR
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1 you paid?

2 A I can't recall.

3 Q What about at AT&T, do you recall
4 how -- were you paid on an hourly basis there?

5 A Hourly.

6 Q And do you remember if you worked
7 overtime?

8 A I can't recall how we were paid.

9 Q When you came to work at Dell, how were
10 you paid?

11 A Salary.

12 Q And was part of that salary guaranteed?
13 I mean, was there a guaranteed base that you
14 would receive?

15 A Yes.

16 Q And did you also receive commissions?

17 A Yes.

18 Q And if you worked more than 40 hours,
19 did you receive any overtime pay?

20 A Yes.

21 Q Had you ever had a job like that where
22 you had a guaranteed base and commissions and
23 overtime?

24 A No.

25 Q What's your educational background?

1 of Edmond, any other post high school training
2 that you've had?

3 A Computers. Computers.

4 Q What kind of computer training?

5 A Just the basic.

6 Q Usage of them, how to use them?

7 A Excuse me?

8 Q How to use computers, that sort of
9 thing?

10 A Yes.

11 Q Different programs?

12 A Yes.

13 Q When you went to work for Dell, were
14 you working on a computer --

15 A Yes.

16 Q -- in making the sales? Do you
17 remember any of the programs, what programs you
18 used for the sales purposes?

19 A No, I can't recall.

20 Q How long did it take you to boot up
21 your computer when you were at Dell?

22 A I'd say maybe about two minutes, three
23 minutes.

24 Q Then you'd be up and running every day?

25 A Yes.

1 A Can't recall.

2 Q Was it like for a while it was done
3 properly and then it changed or was it always --

4 MR. FARHA: Objection.

5 Q (By Mr. Fox) -- in your mind not done
6 properly?

7 A I don't know how it was calculated.

8 Q Okay. When you say you don't know how
9 it was calculated, meaning you don't know how the
10 amount was figured?

11 A Correct.

12 Q Do you think you were paid -- like if
13 you put down that you worked certain hours, were
14 you always paid at least something for those
15 hours?

16 A Yes.

17 Q So it was just you didn't understand
18 how the amount was?

19 A Correct.

20 Q In terms of putting the time down, did
21 you put down all the time that you worked?

22 A Yes.

23 Q Anyone ever tell you "Don't put down
24 this time" or anything like that?

25 A No.

1 Q So you would put down from when you
2 started working till you finished working?

3 A Correct.

4 Q And as I understand, there was a
5 procedure to automatically deduct for lunch, but
6 if you worked through your lunch, there was a way
7 to fix that; is that correct?

8 A I don't know.

9 Q You don't know? Did you ever make any
10 adjustments for lunch?

11 A Yes. Sometimes I could skip lunch or
12 come back early or --

13 Q And did you put that time in properly
14 as well?

15 A Yes.

16 Q So if you, like, went to lunch at 1:30,
17 started at 8:00, went at 1:30 and came back at
18 2:00, you'd put in 8:00 to 1:30 and 2:00 to
19 whenever you left?

20 A Yes.

21 Q And sometimes it's just helpful to make
22 sure we understand what there's a dispute about
23 so we don't spend a lot of time talking about
24 things that are not in dispute.

25 And so my understanding is the issues